EL PASO FIELD SERVICES PRODUCTION PIT CLOSURE

Neah Victoria 2 Meter/Line ID – 97282

SITE DETAILS

Rng: 9

Legals - Twn: 27

NMOCD Hazard Ranking: 30

Operator: Texaco

Sec: 1

Sec: 1 Unit: G H Land Type: Eastern Navajo Agency

KISK-Bedrock

Pit Closure Date: 08/17/94

RATIONALE FOR CLOSURE

The pit noted above was assessed and ranked according to the criteria in the New Mexico Oil Conservation Division's (NMOCD) Unlined Surface Impoundment Closure Guidelines.

A pit was excavated to five feet, where bedrock was encountered, and a soil sample was collected for field headspace analysis and laboratory analysis for benzene, total BTEX, and TPH. Groundwater was not encountered in the test pit. Approximately 30 cubic yards of material was removed for landfarming and sent to an OCD approved centralized site. The pit was backfilled and graded in a manner to direct surface runoff away from the pit area. Headspace analysis indicated an organic vapor content of 128 ppm; laboratory analysis indicated a benzene concentration of <0.5 mg/kg, a total BTEX concentration of 98 mg/kg, and a TPH concentration of 720 mg/kg. This site was re-assessed on August 28, 2000 because the initial assessment incorrectly identified washes as a surface water body.

El Paso Field Services Company (EPFS) requests closure of the above mentioned production pit location for the following reasons:

- The primary source, discharge to the pit, has been removed for over six years.
- The pit was backfilled and the former pit area graded to direct surface runoff away from the former pit.
- Residual hydrocarbons in the soil will degrade by natural attenuation with minimal risk to the environment.
- Groundwater was not encountered in the excavation.
- Bedrock was encountered in the pit at five feet below ground surface, making vertical contaminant migration unlikely and further remediation impractical.
- Excavated material has been removed from the pit, eliminating potential direct contact with livestock or the public.
- The pit was excavated to the practical extent of the equipment, according to EPNG's pit closure plan.

ATTACHMENT

Field Pit Assessment Form Field Pit Remediation/Closure Form Laboratory Analytical Results Revised Field Pit Assessment Form

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REVISED FIELD PIT SITE ASSESSMENT FORM

ULINLIVA	Meter: 97282 Location: NEAH VICTORIA 2 Operator #: 0203 Operator Name: TEXACO P/L District: BAUARD Coordinates: Letter: C Section / Township: 27 Range: 9 Or Latitude Longitude Pit Type: Dehydrator X Location Drip: Line Drip: Other: Site Assessment Date: 8/29/00 Area: 11 Run: 71
	NMOCD Zone: (From NMOCD Maps) Inside Outside Death to Constitute Land Type: BLM (1) State (2) Fee (3) Indian EASTER N NAVALO AGENCY
	Depth to Groundwater Less Than 50 Feet (20 points) □ (1) 50 Ft to 99 Ft (10 points) □ (2) Greater Than 100 Ft (0 points) □ (3)
SITE ASSESSMENT	Wellhead Protection Area Is it less than 1000 ft from wells, springs or other sources of fresh water extraction?, or; Is it less than 200 ft from a private domestic water source? (1) YES (20 points) (2) NO (0 points)
SITE AS	Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points)
	(Surface Water Body: Perennial Rivers, Streams, Creeks, Irrigation Canals, Ditches, Lakes, Ponds) Distance to Nearest Ephemeral Stream (1) < 100' (Navajo Pits Only) (2) > 100'
	TOTAL HAZARD RANKING SCORE: 30 POINTS
REMARKES	Remarks: Site has been re-assessed, due to initial assessment including washes as a Surface Water Body.

FIELD PIT SITE ASSESSMENT FORM

12	
GENERAL	Meter: 97287 Location: Near Victoria Z Operator #: 0763 Operator Name: Texaco P/L District: Ballard Coordinates: Letter: Section Township: Z7Range: 9 Or Latitude Longitude Pit Type: Dehydrator X Location Drip: Line Drip: Other: Site Assessment Date: 6-14-94 Area: Run: 71
REMARKS SITE ASSESSMENT	NMOCD Zone: (From NMOCD Maps) Inside Outside Outside
E	Dat Hard

FIELD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: 97282 Location: NEAL VICTORIA #2 Coordinates: Letter: G Section L Township: 27 Range: 9 Or Latitude Longitude Date Started: 8-17-94 Run: 11 71									
FIELD OBSERVATIONS	Sample Number(s): 190 Sample Depth: $5'$ Feet Final PID Reading 128 PID Reading Depth 5 Feet Yes No Groundwater Encountered \boxed{X} Approximate Depth \boxed{Feet}									
URE	Remediation Method: Excavation Onsite Bioremediation Backfill Pit Without Excavation									
CLOSURE	Soil Disposition: Envirotech Other Facility Name: Pit Closure Date: 8-17-94 Pit Closed By: BFT									
REMARKS	Remarks: Some Like markers OH LOCATION. Started Remediating to. 12 Hit SAND STONE 5' . SOIL LISHT Gray Pid 128 Closed Pit.									
,	Signature of Specialist: Helly Pallla (SP3191) 03/16/94									

CHAIN OF CUSTODY RECORD

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FIELD SERVICES LABORATORY ANALYTICAL REPORT

PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

SAMPLE IDENTIFICATION

	SAMPLE	IDENTIFICA	TION			
	Field	d ID		Lab ID		
SAMPLE NUMBER:	KP 19	70	945	953		
MTR CODE SITE NAME:	9729	82		N/A		
SAMPLE DATE TIME (Hrs):	8/17/9	14	, 5	035		
SAMPLED BY:	·		/A			
DATE OF TPH EXT. ANAL.:	8/18/90		8/19	3/94		:
DATE OF BTEX EXT. ANAL.:		R 22/94	8/27	<u> </u>		
TYPE DESCRIPTION:	YEV	د	Grey Fir	u sand		I
REMARKS:						
		RESULTS				
						. en egjy:
PARAMETER	RESULT	UNITS	DF	QUALIFIE Q	RS M(g)	V(ml)
BENZENE	10.5	MG/KG	20			
TOLUENE	31	MG/KG	20			
ETHYL BENZENE	3.9	MG/KG	20			
TOTAL XYLENES	63	MG/KG	20			
TOTAL BTEX JUST 8 30	4 101 98	MG/KG				
TPH (418.1)	720	MG/KG			1,95	28
HEADSPACE PID	128	РРМ				
PERCENT SOLIDS		922%				
Companie Bassysty was at	TPH is by EPA Method	% for this sample		was accepta	ble.	
ne Surrogate Recovery was at arrative:	uts atta			·		
the I read	us an	4 rcd,				
F = Dilution Factor Used		· · · · · · · · · · · · · · · · · · ·			,	
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GAS CHROMATOGRAPHY RESULTS

TEST

: BTEX (EPA 8020)

CLIENT : E1 PASO NATURAL GAS CO. ATI I.D.: 408380

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPL		1/3 MD 73/	DATE	DATE	DATE	DIL. FACTOR
ID. #	CLIENT I.D.	MATRIX	SAMPLED	EXTRACTED	ANALYZED	
07	945953	NON-AQ	08/17/94	08/22/94	08/22/94	20
08	945954	NON-AQ	08/17/94	08/22/94	08/23/94	10
09	945955	NON-AQ	08/17/94	08/22/94	08/23/94	10
PARAM	ETER		UNITS	07	08	09
BENZE	NE		MG/KG	<0.5	<0.25	<0.25
TOLUE	NE		MG/KG	31	4.0	4.1
ETHYL	BENZENE		MG/KG	3.9	0.42	0.54
TOTAL	XYLENES		MG/KG	63	6.7	18
SURRO	GATE:					
BROMO	FLUOROBENZENE	(%)		106	85	149*
		· •				

^{*}OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE



ATI I.D. 408380

August 24, 1994

El Paso Natural Gas Company P.O. Box 4990 Farmington, NM 87499

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On 08/19/94, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze non-aqueous samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

H. Mitchell Rubenstein, Ph.D.

Laboratory Manager

MR:jt

Enclosure

